

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**v.**

**ANTONIO CHAVEZ,  
Defendant.**

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**EP-25-CV-193**

**JOINT MOTION FOR ENTRY OF JUDGMENT BY CONSENT**

Plaintiff United States of America, by and through the United States Attorney for the Western District of Texas, and Defendant Antonio Chavez, pro se, hereby jointly move for and stipulate to entry of the attached Final Judgment by Consent (“Consent Judgment”). In support of this Motion, the parties aver as follows:

1. On September 29, 2021, an Administrative Law Judge (ALJ), acting under authority delegated by the Secretary of Agriculture, issued a Decision and Order on the Written Record in *In re Antonio Chavez a.k.a. Jose Antonio Chavez d/b/a Buffalo Cattle Company LLC, The Cattle Finder LLC*, P&S-D Docket No. 21-J-0015 (hereinafter the “2021 ALJ Decision”).

2. The 2021 ALJ Decision ordered Defendant Antonio Chavez to cease and desist from failing to pay, when due, the full purchase price of livestock purchases. The 2021 ALJ Decision also suspended Defendant Antonio Chavez’s registration under the Packers and Stockyards Act, 7 U.S.C. §§ 181 *et seq.*, for a period of five years.

3. Plaintiff United States of America alleges that Defendant Antonio Chavez violated the Packers and Stockyards Act and failed to comply with the 2021 ALJ Decision by, between on or about November 1, 2021, and continuing through April 30, 2022, continuing to make livestock purchases while his registration was suspended and, in several instances, failing to pay, when due, the full purchase price for livestock.

4. A person who acts as a market agency or dealer without registering with the Secretary of Agriculture is liable for civil penalties under 7 U.S.C. § 203.

5. A person who violates an order of the Secretary of Agriculture is liable for civil penalties under 7 U.S.C. § 215. The Court may also enforce obedience to the Secretary of Agriculture's order through injunctive relief issued under 7 U.S.C. § 216.

6. Plaintiff United States of America and Defendant Antonio Chavez wish to resolve Plaintiff United States of America's claims under 7 U.S.C. §§ 203, 215, and 216 through entry of the attached Consent Judgment.

7. Defendant Antonio Chavez waives service of the Summons and Complaint.

8. Defendant Antonio Chavez acknowledges that he has read the provisions of the Consent Judgment, has had sufficient time to consider the ramifications of the Consent Judgment, and understands the terms of the Consent Judgment.

9. Without admission of liability or wrongdoing, Defendant Antonio Chavez stipulates to entry of the Consent Judgment, freely and without coercion.

10. For purposes of this action only, Defendant Antonio Chavez admits the facts necessary to establish the Court's jurisdiction.

11. Each party agrees to bear its own attorney's fees and costs incurred in connection with this action.

Dated: June 2, 2025

Respectfully submitted,

JUSTIN R. SIMMONS  
United States Attorney

/s/ Thomas A. Parnham Jr.  
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***Counsel for Plaintiff  
United States of America***

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ANTONIO CHAVEZ  
1448 Franklin Dell Street  
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***Defendant***

Dated: 05/30/2025

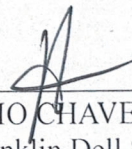
Respectfully submitted,

MARGARET F. LEACHMAN  
Acting United States Attorney

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